IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

		,	
HDI GLOBAL SE,)	
SWISS RE INTERNATIONAL SE, STARR)	
EUROPE INSURANCE LIMITED,)	
VIENNA INSURANCE GROUP, and QBE)	
EUROPE SA/NV, as Subrogees of Currenta)	
GmbH & Co. OHG,)	
)	
Plaintiffs,)	
)	
V.)	C.A. No. 24-878-RGA
)	
FMC CORPORATION,)	
)	
	Defendant.)	

DEFENDANT FMC CORPORATION'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT

Defendant FMC Corporation ("Defendant") hereby moves this Court to dismiss the complaint filed by Plaintiffs HDI Global SE, Swiss Re International SE, Starr Europe Insurance Limited, Vienna Insurance Group, and QBE Europe SA/NV ("Plaintiffs"), Complaint (D.I. 1), pursuant to the doctrine of *forum non conveniens*. The Motion is based on the authorities cited in the accompanying opening brief and the declarations of Professor Ben Steinbrück and Mr. Douglas J. Gush. A proposed order is attached.

Dated: September 27, 2024 Respectfully submitted,

/s/ Daniel M. Silver
Daniel M. Silver (#4758)
MCCARTER & ENGLISH LLP
405 N. King St., 8th Floor
Wilmington, DE 19801
(302) 984-6300
dsilver@mccarter.com

Dane H. Butswinkas (Pro Hac Vice)
Richmond T. Moore (Pro Hac Vice)
Nicholas A. Maricic (Pro Hac Vice)
WILLIAMS & CONNOLLY LLP
680 Maine Avenue S.W.
Washington, DC 20024
Telephone: (202) 434-5000
Fax: (202) 434-5029
dbutswinkas@wc.com
rmoore@wc.com
nmaricic@wc.com

Counsel for Defendant FMC Corporation